

Law Offices of
JAMES E. BAHAMONDE, P.C.

2501 Jody Court
North Bellmore, NY 11710
Long Island Tel. (516) 783-9662
New York City Tel. (646) 290-8258
Fax No. (646) 435-4376
James@CivilRightsNY.com

July 20, 2020

BY ECF

Hon. John G. Koeltl
Southern District of New York
500 Pearl St.
New York, NY 10007

Application granted. The July 22, 2020
conference is canceled.
SO ORDERED.

New York, NY /s/ John G. Koeltl
July 21, 2020 John G. Koeltl, U.S.D.J.

Re. ***Rivera v. 170 Kingsbridge Pistilli LLC, et al.***
 20cv01577 (JGK)(BCM)

Dear Judge Koeltl:

I represent the plaintiff in the above referenced action and respectfully request a two-week extension of time to file the application for a Temporary Restraining Order and preliminary injunction.

This evening, Defendants' counsels, Robert Plosky and Jonathan Farrell, contacted my office with the objective of avoiding the application for Temporary Restraining Order and preliminary injunction. Defendants have affirmed it will stay the renovation of the elevator and not take it out of service for at least two weeks. In addition, Defendants have agreed not to lease one suitable, vacant, ground-floor unit.

In hopes we can find some resolution in the next two weeks regarding the elevator and Plaintiff's request for a reasonable accommodation to temporary move to a ground-floor unit, and to save judicial resources, Plaintiff respectfully requests a two-week extension of time to file an application for a TRO and preliminary injunction. In 10 days, Plaintiff will file a status letter.

Additionally, Defendants counsel has agreed to accept service of the Amended Complaint and the two court orders dated July 20, 2020.

I thank you for your attention and consideration.

Respectfully Yours,

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/s/ James E. Bahamonde

James E. Bahamonde, Esq.

cc:

Jonathan Farrell

Robert Plosky

Meltzer, Lippe, Goldstein & Breitstone, LLP

Attorneys for Defendants.